

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Wicked Nevada, LLC,)	
)	Case No.: 1:19-cv-413-SOM-KJM
Plaintiff,)	(Copyright)
vs.)	DECLARATION OF COUNSEL
)	
JOHN Doe dba YTS et. al.,)	
)	
Defendants.)	
)	
)	
)	

DECLARATION OF COUNSEL

KERRY S. CULPEPPER, hereby declares under penalty of law that the following is true and correct:

1. I am an attorney and represent the Plaintiff, I have personal knowledge of the matters stated herein, and this declaration is given in support of Plaintiff's Motion for Leave to File the First Amended Complaint filed herewith.

2. Around August 9, 2019 I discovered that the dissolved company Techmodo Limited which is the registrant for the domain YTS.LT of Defendant JOHN DOE had been reincorporated or newly reformed.

3. A true and correct copy of the proposed First Amended Complaint is attached hereto as Exhibit "2" (exhibits and declarations excluded). A redlined version of the proposed First Amended Complaint is attached hereto as Exhibit "1"

(exhibits and declarations excluded).

4. In the proposed First Amended Complaint, I have named Senthil Vijay Segaran (the sole shareholder and director of Techmodo Limited) as the sole defendant and deleted claims against Does 1-16.

5. On November 27, 2019, I submitted a proposed notice of dismissal without prejudice of Defendant Does 1-16 named in the original Complaint to chambers of Judge Mollway.

6. Pursuant to FRCP Rule 15(a)(1)(2), after amending a pleading once as a matter of course, a party may amend its pleadings with the court's leave, which "shall be freely given when justice so requires."

7. Based on the foregoing, Plaintiff respectfully requests that they be given leave to file their proposed First Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, November 27, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiff